

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018.

Date filed: February 21, 2019

Name of company covered by this certification: Summit Telecom, LLC

Form 499 Filer ID:

Name of signatory: Shane Unfred

Title of signatory: Managing Member

I, Shane Unfred, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

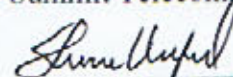
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by the company at state commissions, the court system, or the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints during the period covered by this certification concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Summit Telecom, LLC



Shane Unfred

Managing Member, President

Summit Telecom, LLC

6165 Bay Meadows Drive,  
Windsor, CO 80550

Attachment: Accompanying Statement explaining CPNI procedures.

**Annual 47 C.F.R. § 64.2010(e) CPNI Certification**  
**EB Docket 06-36**

**Attachment 1: Statement Concerning Company Procedures**

Summit Telecom, LLC ("Company") has established strict policies and procedures, which expressly prohibit release of Customer Proprietary Network Information ("CPNI") to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees that may have access to CPNI receive an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require approval of the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

In calendar year 2018, the Company took no action against data brokers. In calendar year 2018, the Company received no consumer complaints regarding CPNI issues.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.